



If the Court denies both of those motions, it should nonetheless substantially reduce the jury's awards of front pay and compensatory damages and completely eliminate the awards of enhanced compensatory damages and punitive damages. Accordingly, as discussed in the accompanying Memorandum of Law, Walmart seeks a remittitur.

In support of its Motions, Walmart submits its Memorandum of Law filed contemporaneously herewith.

WHEREFORE, the Court should grant Walmart's renewed motion for judgment as a matter of law or, in the alternative, order a new trial or a remittitur.

In accordance with Local Rule 7.1(c), Walmart's counsel states that he conferred with McPadden's counsel via email on this date regarding Walmart's motions and McPadden does not assent to the relief requested herein.

Respectfully submitted,

**WAL-MART STORES EAST, L.P.**

By its attorneys,

/s/ Christopher B. Kaczmarek

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March 1, 2016

**CERTIFICATE OF SERVICE**

I, Christopher B. Kaczmarek, hereby certify that on this 1st day of March, 2016, the foregoing document was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing and via first class mail to all non-registered participants identified on the Notice of Electronic Filing.

/s/ Christopher B. Kaczmarek

Christopher B. Kaczmarek

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